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CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY:	DEPUTY

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 KENNETH MOORE AND LATOYA JONES,
16 Defendants.

Case No. 2:19-mj-363-VCF

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

ORDER

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Susan Cushman, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Kenneth Moore, and Chris
21 T. Rasmussen, counsel for Latoya Jones that the Preliminary Hearing currently scheduled on
22 June 3, 2019, be vacated and continued to a date and time convenient to the Court, but no sooner
23 than forty-five (45) days.

24 This Stipulation is entered into for the following reasons:
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26

1 1. The Government intends on making an early production of discovery to the
2 Defendant in an effort to reach a pre-indictment plea agreement, and counsel for the Defendant
3 will need time to review the discovery and discuss it with the Defendant.

4 2. The parties are researching the viability of entering into a pre-indictment plea
5 agreement. Said plea agreement would obviate the need for either a preliminary hearing in this
6 matter or for the Government to present this matter to a federal grand jury. Counsel for the
7 Defendant will need additional time to discuss the Defendant's options with him.

8 3. Defendants are not incarcerated and do not object to a continuance.

9 4. Denial of this request for continuance of the preliminary hearing would
10 potentially prejudice both the Defendant and the Government and unnecessarily consume this
11 Court's valuable resources.

12 5. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice. The additional time requested by this Stipulation is excludable in computing the time
14 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
15 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
16 Section 3161(h)(7)(B)(i), (iv).

17 This is the first request for continuance filed herein.

18 DATED this 29th day of May, 2019.

19 RENE L. VALLADARES
20 Federal Public Defender

21 NICHOLAS A. TRUTANICH
22 United States Attorney

23 /s/ Heidi A. Ojeda
24 By _____
25 HEIDI A. OJEDA
26 Assistant Federal Public Defender

21 /s/ Susan Cushman
22 By _____
23 SUSAN CUSHMAN
24 Assistant United States Attorney

25 /s/ Chris T. Rasmussen
26 By _____
25 CHRIS T. RASMUSSEN
26 Counsel for Latoya Jones

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v₁

KENNETH MOORE AND LATOYA JONES,

Defendants.

Case No. 2:19-mj-363-VCF

ORDER

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on June 3, 2019 at the hour of 4:00 p.m., be vacated and continued to July 16, 2019 at the hour of 4:00 p.m.

DATED this 30th day of May, 2019.

Carl Babb

UNITED STATES MAGISTRATE JUDGE